

Eric L. Harrison - ID #033381993  
METHFESSEL & WERBEL, ESQS.

2025 Lincoln Highway, Suite 200

PO Box 3012

Edison, New Jersey 08818

(732) 248-4200

1(732) 248-2355

harrison@methwerb.com

Attorneys for Woodbridge Township School District, Woodbridge

Township Board of Education, Glenn Lottman and Robert Zega as to

Counts 1-5 and 7-14

Our File No. 84369 ELH

JASON MOSTAFA ALI

Plaintiff,

V.

WOODBIDGE TOWNSHIP SCHOOL  
DISTRICT, WOODRIDGE BOARD OF  
EDUCATION, GLENN LOTTMAN,  
INDIVIDUALLY AND IN HIS OFFICIAL  
CAPACITY AS PRINCIPAL, ROBERT  
ZEGA, INDIVIDUALLY AND IN HIS  
OFFICIAL CAPACITY AS  
SUPERINTENDENT OF SCHOOLS,  
AND JOHN DOES 1-10, FICTITIOUS  
DESIGNATIONS

Defendants.

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
CIVIL ACTION NO.:

NOTICE OF REMOVAL TO UNITED  
STATES DISTRICT COURT

**PLEASE TAKE NOTICE** that Defendants, Woodbridge Township School District, Woodbridge Township Board of Education, Glenn Lottman and Robert Zega hereby file this Notice of Removal of the above-captioned matter to the United States District Court for the District of New Jersey, Newark Division from the Middlesex County Superior Court, Law Division, where the action is now pending, pursuant to 28 U.S.C. § 1446 and state:

1. The Woodbridge Township School District, Woodbridge Township Board of Education, Glenn Lottman and Robert Zega are defendants in the above-captioned matter.

2. The action is a civil action commenced in the Middlesex County Superior Court, Law Division on or about March 13, 2017 under docket number MID- L-1579-17, and is pending therein.

3. Because of the following facts defendants request that this action proceed in this Court as an action properly removed to it:

A. In the Complaint, at Counts 11-14, Plaintiff asserts claims under the 1<sup>st</sup> and 14<sup>th</sup> Amendments to the United States Constitution as well as violations of 42 U.S.C. Sec 1981, 29 U.S.C. Sec 1161 et seq. and 29 U.S.C. Sec. 1001 et seq.

B. This Court has original jurisdiction under the provisions of 28 U.S.C. § 1331, because Plaintiff's claims raise issues under the United States Constitution and federal law.

C. Accordingly, this action may be removed by Defendants under 28 U.S.C. § 1441.

4. Thirty days have not elapsed since the service of process upon the Defendants in state court as Defendants were served on or about March 24, 2017.

5. Copies of all process, pleadings, and orders served upon defendant are attached to this Notice of Removal, in accordance with 28 U.S.C. § 1446.

6. Concurrent with the filing of this Notice of Removal, Defendants are providing written notice to all parties and the Clerk of the Superior Court of New Jersey, Law Division, County of Middlesex pursuant to 28 U.S.C. § 1446.

**WHEREFORE**, Defendants request that this action proceed in this Court as an action properly removed to it.

**METHFESSEL & WERBEL, ESQS.**  
Attorneys for Defendants  
Woodbridge Township School  
District, Woodbridge Township  
Board of Education, Glenn Lottman  
and Robert Zega as to  
Counts 1-5 and 7-14



By: \_\_\_\_\_  
Eric L. Harrison

DATED: April 3, 2017